

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

JONATHAN DOUGLAS FRANCO,
a/k/a JONATHAN D. FRANCO,
a/k/a JONATHAN FRANCO, and
ACENETH CRISTINA MERCADO-FRANCO,
a/k/a ACENETH C. MERCADO FRANCO,
a/k/a ACENETH MERCADO FRANCO,
a/k/a ACENETH C. FRANCO,
a/k/a ACENETH C. MERCADO,
f/d/b/a ZENNY'S BOUTIQUE,
Debtor(s)

CHAPTER 13

CASE NO.5:21-bk-01462

MOTION FOR ORDER TO AMEND CHAPTER 13 PLAN
AFTER CONFIRMATION

The Motion of the above-named Debtor alleges:

1. Debtor's Chapter 13 Plan was confirmed on November 04, 2021.
2. Debtor desires to amend Debtor's Chapter 13 Plan because the Third Amended Plan contemplated that Debtors' auto loans would be paid in full by July, 2024. However, the auto loans will not be repaid until after June, 2026, when the Plan is scheduled to end.

3. The Fourth Amended Chapter 13 Plan provides for payment of \$500.00 in additional legal fees to Newman Williams, P.C. for legal work associated with the preparation and filing of the Amended Chapter 13 Plan.

4. By reason of the foregoing, Debtor proposes that pursuant to Section 1329(a) of the Bankruptcy Code, Debtor's Chapter 13 Plan be modified as set forth in the attached proposed Fourth Amended Chapter 13 Plan.

WHEREFORE, Debtor prays that this Motion be granted and that Debtor's Chapter 13 Plan be modified, as set forth in this Motion.

Dated: May 31, 2024

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell, Esq.

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